



# LEE'S SUMMIT MISSOURI

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## Substantial Damage Management Plan Annual Evaluation Report

NFIP Community #: 290174

*CRS communities that receive Substantial Damage Plan (SDP) credit (Activity 512.d) for having a plan to manage substantial damage within their jurisdictions are required to either update the SDP or submit an evaluation of the SDP every year with their annual CRS recertification. The purpose of this evaluation is to focus on specific portions of the plan and initiate changes, if needed.*

**Date initial SDP was submitted to City Council:** September 19, 2023

**Date current SDP was submitted to City Council:** September 19, 2023 (*SDP has not been revised since initial development*)

**Date this evaluation report was submitted to City Council:** October 2024

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### **1. What process was used to evaluate the SDP and to prepare this annual evaluation report for the past year?**

City staff has reviewed the entirety of the City's SDP, section by section, to determine if the SDP is accurate and/or needs to be updated or revised.

### **2. Over the past year, were any changes made to location ordinances, regulations, definitions, or other standards that pertain to the substantial damage or substantial improvement of buildings? If yes, please describe changes.**

Yes. While not directly related to Substantial Damage or Substantial Improvement, the Flood Insurance Study (FIS) for Jackson County was updated in 2023, which required official adoption by the City before the end of that year. Revision to Article 5 of the City's Unified Development



Ordinance (UDO), also known as the City's Floodplain Ordinance, was presented to the City Council in October 2023 and officially adopted by the City Council on November 14, 2023.

Additionally, the City's Floodplain Ordinance includes a 2-foot freeboard requirement. However, the CRS Resource Specialist assigned to the City of Lee's Summit indicated that the City cannot receive full CRS credit for a higher freeboard standard until the City adds "mechanical, electrical, and other utility equipment" to the Specific Standards section of the City's Floodplain Ordinance (Section 5.170.B.1.a). Revisions to the Floodplain Ordinance are currently in process and will be presented to the City Council in the coming months.

**3. For each of the six steps of the CRS-credited planning process, indicate whether it has been implemented or changed, and explain.**

On July 1 and July 3/4, 2024, the City experienced heavy rainfall and riverine flooding in concentrated areas of the City, which resulted in the implementation of the SDP. Residents contacted the Public Works Department to report yard and residential flooding while staff dispersed throughout the community to observe flooding conditions in the FEMA-regulated floodplain.

***Step 1 (Substantial Damage Vulnerability Assessment)***

As part of the annual SDP review, City staff evaluated all components of Step 1. Updates or revisions to these components are explained below.

***Component 1 (Substantial Damage Regulations and Definitions Review)***

- definitions for Substantial Damage, Substantial Improvement, and Repetitive Loss in Article 5 of the City's UDO.

As explained in Question 2 above, the City's Floodplain Ordinance includes a 2-foot freeboard requirement. However, the City's CRS Coordinator indicated that the City cannot receive full CRS credit for a higher freeboard standard until the City adds "mechanical, electrical, and other utility equipment" to the Specific Standards section of the City's Floodplain Ordinance (Section 5.170.B.1.a). Revisions to the Floodplain Ordinance are currently in process and will be presented to the City Council in the coming months.

***Component 2 (Previous Substantial Damage and Substantial Improvement Determinations)***

- primary flood risk to the community
- flood damage history related to flood risk
- prior damage assessment records

No changes to the primary flood risk or flood damage history related to flood risk were identified during review of the City's SDP or following the flooding events in July 2024.



*Component 3 (List and Maps of SFHA Properties)*

- inventory and maps of structures susceptible to Substantial Damage

No changes to the inventory of structures susceptible to Substantial Damage or to the maps locating these structures were identified during review of the City's SDP or following the flooding events in July 2024.

*Component 4 (Other Considerations, including Tracking Procedures for Substantial Damage)*

- tracking procedures for Substantial Damage and Repetitive Loss properties
- tracking procedures for Substantial Improvement, although this is actively being discussed among staff to determine if a better method is available

No changes to the tracking procedures for Substantial Damage, Repetitive Loss, or Substantial Improvement were identified during review of the City's SDP or following the flooding events in July 2024.

*Component 5 (General Description of Buildings on Potential Substantial Damage list)*

- general description of structures on the City's potential Substantial Damage list

No changes to the description of structures on the City's potential Substantial Damage list were identified during review of the City's SDP or following the flooding events in July 2024.

***Step 2 (SDP Team)***

As part of the SDP review, City staff evaluated the list of SDP team members identified in the City's SDP. The staff positions included in the plan were determined to still be accurate. Although not identified as official members of the team, staff from the Fire Department and Police Department were invited to sit in on the SDP Team meeting that took place on April 11, 2024 so they 1) are aware of the requirements of the SDP and 2) can be a resource during an event, if necessary.

***Step 3 (Post-Event Efforts Related to Substantial Damage):***

As part of the SDP review, City staff evaluated all components of Step 3. No updates or revisions to these components were determined necessary.

*Component 1 (Post-Event Coordination and Communication efforts)*

- staff training; actively being scheduled and implemented
- communications with elected officials, property owners, and the public

No changes to staff training or post-event communications with elected officials, the public, or property owners were identified during review of the City's SDP or following the flooding events in July 2024.



#### *Component 2 (Damage Estimate and Substantial Damage Determination Procedures)*

- initial damage assessment screening procedures
- substantial damage determination procedures, including determinations of: damage costs, structure market value, comparing damage costs and market value to substantial damage thresholds, requiring property owners to obtain permits for rebuilding.

No changes to initial damage assessment screening procedures or substantial damage determination procedures were identified during review of the City's SDP or following the flooding events in July 2024.

#### *Component 3 (Compliance Procedures for Substantially-Damaged Structures)*

- procedures for notifying property owners of substantial damage
- if warranted, procedures for:
  - obtaining affidavits from property owners and contractors
  - obtaining an Intent to Raze or Demolish document
  - providing temporary certificate of occupancy, if warranted
- variance procedures
- compliance enforcement procedures
- procedures for notifying the City Attorney and SEMA/FEMA

No changes to compliance procedures for substantially-damaged structures were identified during review of the City's SDP or following the flooding events in July 2024.

#### **Step 4 (Database for Substantial Damage Estimates):**

As part of the SDP review, City staff evaluated all components of Step 4. No revisions to these items were determined necessary.

#### *Components 1 & 2 (Basic Substantial Damage Property Database & Pre-Populating FEMA SDE 3.0)*

- property information in City Excel spreadsheet and FEMA SDE 3.0 database

Following the July 2024 flooding events, City staff completed five (5) Substantial Damage Evaluations. These Substantial Damage Evaluation documents were added to the FEMA 3.0 database.

#### **Step 5 (Pre-Event Actions to Address Potential Substantial Damage):**

As part of the SDP review, City staff evaluated the City's process of educating the community about substantial damage requirements. On an annual basis, the City sends letters to property owners who live within and in close proximity to the SFHA and to property owners with structures incurring repetitive loss. These letters not only include the required topics for CRS Activities 502-504 (Repetitive Loss) but also include information regarding substantial damage and/or improvements and NFIP requirements. No updates or revisions to this process was determined necessary;



however, the letters to impacted property owners were revised to include property protection advice and information on financial assistance, to achieve compliance with CRS Activity 360.

***Step 6 (Plan Implementation and Update Procedures):***

As part of the SDP review, City staff evaluated the process for annual SDP review, procedures for annual communication with the City Council, process for updating the SDP. No updates or revisions to these items were determined necessary.

- 4. For each pre-event action item listed in the SDP (Step 5), indicated whether the team was implemented during the past year, describe the implementation, and explain what change is recommended for that item, if any.**

On April 11, 2024, the SDP Team met officially for the first time for training. Beyond that meeting, the team did not need to be implemented to address a flood or other related emergency during the past year.

- 5. Over the past year, has the community experienced any flood damage? If yes, please describe.**

Yes. On July 1 and July 3/4, 2024, the City experienced heavy rainfall and riverine flooding in concentrated areas of the City, which resulted in the implementation of the SDP. The rain events lasted 4-6 hours each and the flooding events each lasted less than approximately 2 hours. City staff completed five (5) Substantial Damage Evaluations following these events. All five of these properties and have experienced riverine flooding in the past, for which City staff have previously completed Substantial Damage Evaluations. No other residential structures located in the SFHA experienced flooding during these events, that City staff is aware of.

- 6. Over the past year, was the SDP used after a flood or other event? If yes, please describe how the SDP was implemented, how its use was evaluated, and what recommendations were made for improvements.**

Yes. As explained in Question 3 above, on July 1 and July 3/4, 2024, the City experienced heavy rainfall and riverine flooding in concentrated areas of the City, which resulted in the implementation of the SDP. Residents contacted the Public Works Department to report yard and residential flooding while staff dispersed throughout the community to observe flooding conditions in the FEMA-regulated floodplain.

City staff completed five (5) Substantial Damage Evaluations following the July 2024 events. All five of these properties and have experienced riverine flooding in the past, for which City staff have previously completed Substantial Damage Evaluations. No other residential structures located in the SFHA experienced flooding during these events, that City staff is aware of.



Because the flooding events in July 2024 were short in duration (less than 2 hours of flood inundation in residential structures) and City staff was able to visually inspect stream levels during the rain events, several action items identified in the SDP did not need to be implemented, as follows:

- Physical meeting with appropriate staff to review roles and responsibilities. City staff (Floodplain Administrator, Environmental Specialist, CFMs, and engineering staff) were in constant contact via telephone and email to converse about active flooding issues so a meeting was determined to be unnecessary.
- Letters to property owners located within the SFHA informing them of impending damage inspections/permitting requirements. City staff was able to quickly ascertain which properties in the SFHA experienced flooding so a letter to all property owners in the SFHA was determined to be unnecessary.
- Press Release. As with the letters to property owners, a press release was determined to be unnecessary as the event impacted a concentrated area of the City.

Because so few structures in the SFHA experienced flooding during the July 2024 events, City staff did not need to utilize a printed map to identify the locations of the structures. In addition, all five of the structures in the SFHA that encountered flooding were multi-housing structures that took on flood waters in the basement-level garages; therefore, door hangers were not placed on each residence. None of the structures were determined to be unsafe or uninhabitable during the field assessments.

Since the flooding occurred in multi-housing structures, none of the property owners were present during the Substantial Damage field evaluations; therefore, the evaluations were completed from the exterior of the structures. A garage door was open at one of the rental units allowing a visual inspection of the interior (all units are constructed essentially identical) and City staff has performed Substantial Damage Evaluations on these structures in the past. None of the structures were determined to be substantially damaged as a result of the July 2024 events and none of the structures reached the 10-year cumulative substantial damage/substantial improvement threshold.

The flooding resulting from the July 2024 rain events was concentrated to a specific area of the City so City staff did not need to fully implement the SDP. The sections of the SDP that were needed were useful and City staff has no recommendations for SDP improvements during this reporting period.

**7. Have any community officials participated in training on substantial damage or in training on the SDP over the past year?**

No. If the City Council is interested in receiving training on Substantial Damage, City staff will happy to provide that training.



- 8. Has the SDP been revised or updated in the past year? If yes, describe the circumstances of the update, the specific changes, and attach a copy of the revised plan.**

No. While the City experienced flooding in July 2024, the flooding was concentrated to a specific area of the City so City staff did not need to fully implement the SDP. City staff reviewed the entirety of the City's SDP, section by section, but determined that no updates or revisions were necessary this year.

- 9. As a result of the review of the SDP, are there any recommendations or changes to the plan? If yes, please describe and explain.**

Yes. The City's Fire Department Emergency Manager reviewed the plan and suggested modifying the language to broaden key words to include an all-hazard approach, while still be inclusive of flood-specific hazards. At this time, City staff has decided to leave the plan as is, since the plan is new and was approved by FEMA/CRS as is. This is a change that may be addressed with the next annual review of the plan.

Additionally, when the City Council approves the new Floodplain Ordinance language to include mechanical, electrical, and other utility equipment in the freeboard section, the SDP will be modified to explain that change.

**10. For communities receiving SDP2 credit:**

- a. Has a review of the property database been completed?**

Yes, City staff has reviewed all of the properties in the FEMA SDE 3.0 software.

- b. Has any outdated information been corrected in the database (structures removed from the list, changes in property ownership or in market value, etc.)**

Yes, City staff has reviewed all of the properties in the FEMA SDE 3.0 software to ensure the data is as accurate as possible.

- c. Has the updated database been imported into FEMA's SDE 3.0 software?**

Yes. City staff corrected ownership on one property in FEMA's SDE 3.0 software.

**11. For communities receiving SDP3 credit: *(not currently applicable to the City of Lee's Summit)***

- a. Has the list of properties of potential substantial damage areas changed during the past year?**

N/A



**b. Have any properties listed in the SDP been mitigated during the past year?**

N/A

**c. Has the community's mitigation strategy for these properties or areas changed during the past year?**

N/A

**12. Other comments?**

None

